



STATE BOARD OF EQUALIZATION

July 28, 1953

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Gentlemen:

This is in answer to your letter of July 16 requesting to be informed whether sales to Navy Relief Societies are exempt from California retail sales tax.

The exemption upon which the society relies, as indicated in the second paragraph of your letter, is the exemption of sales to the United States and certain of its instrumentalities and agencies. Navy Relief Societies are not agencies or instrumentalities of the United States and we, therefore, are unable to recognize sales to such societies as exempt transactions.

If your customer takes the position that it is an instrumentality of the United States, we suggest that you obtain from the society, or have the society forward directly to us, a statement of its reasons for claiming to be an agency or instrumentality of the United States.

Very truly yours,

E. H. Stetson
Tax Counsel

EHS:ph